

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NATIONAL UNION FIRE INSURANCE COMPANY
OF PITTSBURGH, PA, individually and as an assignee
and subrogee of Mechanical Dynamics & Analysis, LLC,
and LEXINGTON INSURANCE COMPANY,
individually and as an assignee and subrogee of
Mechanical Dynamics & Analysis, LLC,

Case No. 07-CV-11073 (WHP)

ECF Case

**MOTION TO ADMIT
COUNSEL PRO HAC VICE**

Plaintiffs,

-against-

CONTINENTAL CASUALTY COMPANY,

Defendant.

X-----X

PURSUANT TO RULE 1.3(c) of the United States District Courts for the Southern and
Eastern Districts of New York, I, Eileen de Callies, a member in good standing of the bar of this
Court, hereby move for an Order allowing the admission *pro hac vice* of

Applicant's Name: Margaret F. Catalano, Esq.

Firm Name: Carroll, McNulty & Kull L.L.C.

Address: 120 Mountain View Boulevard
P.O. Box 650

City/State/Zip: Basking Ridge, New Jersey 07920

Phone Number: (908) 848-6300

Fax Number: (908) 848-6310

Margaret F. Catalano, Esq. is a member in good standing of the Bar of the State of New
Jersey.

There are no pending disciplinary proceedings against Margaret F. Catalano, Esq. in any
State or Federal Court.

Dated: New York, New York
June 16, 2008

Respectfully submitted,

A handwritten signature in cursive script, reading "Eileen de Callies".

Eileen de Callies (ED 2938)
Carroll, McNulty & Kull L.L.C.
570 Lexington Avenue, 10th Floor
New York, New York 10022
(212) 252-0004

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ECF Case

**AFFIRMATION IN SUPPORT
OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

Plaintiffs,

-against-

CONTINENTAL CASUALTY COMPANY,

Defendant.

X-----X

State of New York)
) ss.
County of New York)

EILEEN de CALLIES, being duly sworn, hereby deposes and says as follows:

1. I am an associate at the law firm of Carroll, McNulty & Kull LLC, counsel for Continental Casualty Company ("Continental") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Continental's motion to admit Margaret F. Catalano, Esq. as counsel *pro hac vice* to represent Continental in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in April, 1995. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Margaret F. Catalano since August 2007.

4. Margaret F. Catalano is a member of McNulty & Kull L.L.C. in Basking Ridge, New Jersey.

5. I have found Ms. Catalano to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. A Certificate of Good Standing on behalf of Margaret F. Catalano is attached hereto as Exhibit A.

7. Accordingly, I am pleased to move for the admission of Margaret F. Catalano *pro hac vice*.

8. I respectfully submit a proposed Order granting the admission of Margaret F. Catalano, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the motion to admit Margaret F. Catalano *pro hac vice* to represent Continental in the above captioned matter, be granted.

Dated: New York, New York
June 16, 2008

Respectfully submitted,



Eileen de Callies (ED 2938)
Carroll, McNulty & Kull L.L.C.
570 Lexington Avenue, 10th Floor
New York, New York 10022
(212) 252-0004

Supreme Court of New Jersey

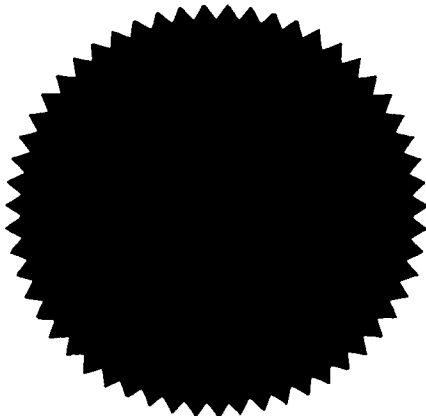


Certificate of Good Standing

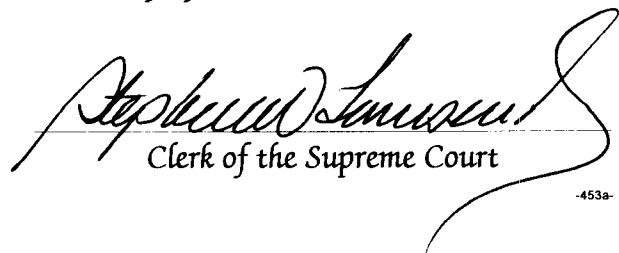
This is to certify that **MARGARET FLANNERY CATALANO**
(No. **034321985**) was constituted and appointed an Attorney at Law of New
Jersey on **December 23, 1985** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
9TH day of June , 20 08


Clerk of the Supreme Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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and LEXINGTON INSURANCE COMPANY,
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Mechanical Dynamics & Analysis, LLC,

Case No. 07-CV-11073 (WHP)

ECF Case

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Plaintiffs,

-against-

CONTINENTAL CASUALTY COMPANY,

Defendant.

X-----X

Upon the motion of Eileen de Callies, Esq., attorney for Defendant and said sponsor
attorney's Affirmation in support;

IT IS HEREBY ORDERED that

Applicant's Name: Margaret F. Catalano, Esq.

Firm Name: Carroll, McNulty & Kull L.L.C.

Address: 120 Mountain View Boulevard
P.O. Box 650

City/State/Zip: Basking Ridge, New Jersey 07920

Phone Number: (908) 848-6300

Fax Number: (908) 848-6310

is admitted to practice *pro hac vice* as counsel for Continental Casualty Company in the above
captioned case in the United States District Court for the Southern District of New York. All
attorneys appearing before this Court are subject to the Local Rules of this Court, including the
Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing

(ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall forward the *pro had vice* fee to the Clerk of the Court.

Dated: New York, New York

William H. Pauley, III, U.S.D.J.

AFFIDAVIT OF SERVICE

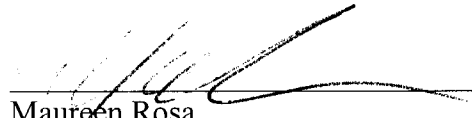
STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

MAUREEN ROSA, being sworn, deposes and says that she is over the age of eighteen years, resides in Westchester County, New York and is employed in the office of Carroll, McNulty & Kull L.L.C.

On the 16th day of June, 2008, deponent states that service of a true copy of the within *Motion to Admit Counsel Pro Hac Vice* made on the listed addressee attorney(s) by mail on the date indicated below, by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State:

TO: Alba Alessandro
 Patrick Matthew Tomovic
 HODGSON RUSS LLP
 60 East 42nd Street, 37th Floor
 New York, New York 10165

Kevin D. Szczepanski
HODGSON RUSS LLP
140 Pearl Street, Suite 100
Buffalo, New York 14202


Maureen Rosa

Sworn to before me this
16th day of June, 2008.


NOTARY PUBLIC

**EILEEN DECALLIES
NOTARY PUBLIC, STATE OF NEW YORK
NO. 02DE6183213
QUALIFIED IN QUEENS COUNTY
Commission Expires on March 10, 2012**